

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

MONICA DANIEL HUTCHISON,

Plaintiff,

v.

TEXAS COUNTY, MISSOURI,
MICHAEL R. ANDERSON,
TEXAS COUNTY PROSECUTING
ATTORNEY, and
MICHAEL R. ANDERSON, individually,

Defendants.

Case No.: 09-3018-CV-S-RED

MOTION TO SEAL DEPOSITIONS OF SETH WALKER AND JEFF KINDER

COMES NOW Defendant Michael R. Anderson (hereinafter "Defendant Anderson"),
by and through counsel, and for his Motion to Seal the Depositions of Seth Walker and Jeff
Kinder, states as follows:

1. As part of the discovery proceedings in this case, the depositions of Seth Walker and Jeff Kinder have been taken.
2. Mr. Walker and Mr. Kinder are both employed in the law enforcement profession.
3. In both of their depositions, matters were inquired into regarding Mr. Walker's and Mr. Kinder's personal private lives.
4. Neither Mr. Walker nor Mr. Kinder are parties in this action.
5. Both Mr. Walker and Mr. Kinder requested that their depositions be sealed.

6. Counsel for Texas County and counsel for the plaintiff do not have any objection to the depositions of Mr. Walker and Mr. Kinder being sealed.

7. Pretrial depositions are not public components of a civil trial and are generally conducted in private. ***Seattle Times Company v. Rhinehart, 467 U.S. 20, 33 (1984)***. As such, restraints that are placed on discovered but not yet admitted information are not considered to be a restriction on a traditionally public source of information. ***Id.***

8. Defendant Anderson requests that the deposition be sealed so as to prevent their distribution to the public or third parties, while still allowing any of the parties in this action to use such depositions in the prosecution of the issues in this case.

WHEREFORE, Defendant Anderson moves the Court to seal the depositions of Seth Walker and Jeff Kinder and for such other and further relief as the Court deems just in the premises.

**TAYLOR, STAFFORD, CLITHERO,
FITZGERALD & HARRIS, LLP**

/s/Warren E. Harris

By _____
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**COUNSEL FOR DEFENDANT
ANDERSON**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 18th day of June, 2010, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel for Plaintiff, David L. Steelman and Corey L. Franklin.

/s/ Warren E. Harris

Warren E. Harris